

KIRTON LAW FIRM

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VIA ELECTRONIC FILING

Hon. Paul G. Gardephe
United States District Court
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *US v. Yiyi Chen 23 cr. 302 (PGG)*,

Dear Judge Gardephe:

I represent Yiyi Chen in the above-referenced matter. The Defense intends to file the following motions:

1. Motion to Dismiss.
2. Motion to controvert several search warrants.
3. Motion Challenging this Court's Jurisdiction.
4. Motion alleging Entrapment.

Please contact me if you have any questions or concerns.

Sincerely,

Marlon Kirton
Marlon G. Kirton, Esq.

cc: All Counsel via electronic filing

